



Order Filed on May 3, 2022  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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*Counsel for National Financial Solutions, LLC*

In re:

LORI KIM ANDREWS JONES  
A/K/A LORI-KIM ANDREWS,  
A/K/A LORI-KIM VICTA,

Debtor.


Chapter 13

Case No. 21-16020 (ABA)

**CONSENT ORDER RESOLVING THE LIMITED OBJECTION  
OF NATIONAL FINANCIAL SOLUTIONS, LLC TO  
CONFIRMATION OF DEBTOR'S AMENDED CHAPTER 13 PLAN**

The relief set forth on the following pages, numbered two(2) through three (3), is hereby  
**ORDERED.**

**DATED: May 3, 2022**

  
\_\_\_\_\_  
Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

Page No.: 2  
Debtor: Lori Kim Andrews Jones a/k/a Lori-Kim Andrews a/k/a Lori-Kim Victa  
Case No.: 21-16020 (ABA)  
Title: Consent Order Resolving the Limited Objection of National Financial Solutions, LLC to Confirmation of Debtor's Amended Chapter 13 Plan

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~~THIS MATTER~~ having been brought before the Court by McCarter & English, LLP, attorneys for secured creditor National Financial Solutions, LLC ("NFS"), by way of the Limited Objection (the "Limited Objection") (Dkt. No. 42) to the confirmation of the Modified Chapter 13 Plan dated January 25, 2022 (Dkt. No. 32) (the "Plan") proposed on behalf of Lori Kim Andrews Jones (the "Debtor"); and counsel for NFS (Inez M. Markovich, Esq.) and counsel for the Debtor (Andrew B. Finberg, Esq.) having reached an amicable resolution of the matter; and the Court having considered the representations made by the parties; and for good cause shown,

IT IS on this \_\_\_\_ day of \_\_\_\_\_, 2022,

**ORDERED** that any agreement of sale between Debtor, as seller, and any third-party buyer (an "Agreement of Sale") with respect to Debtor's real property located at 308 North Clarendon Avenue, Margate, NJ 08402 (the "Property") shall be subject to NFS's review and approval;

**ORDERED** that Debtor shall consummate the sale of the Property pursuant to an Agreement of Sale on or before July 1, 2022; and it is further

**ORDERED** that Debtor is to make post-petition payments in accordance with the terms of the Loan Documents<sup>1</sup>; and it is further

**ORDERED** that, pursuant to the Plan, upon closing of the aforesaid sale of the Property, Debtor shall pay NFS the following amounts from the sale proceeds on account of its secured claim No. 11-1 filed in the above-captioned case (as may be amended or supplemented from time to time): the entire outstanding

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<sup>1</sup> Any capitalized terms not defined herein shall have the meaning ascribed in the Limited Objection.

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principal balance of the Loan, together with any and all accrued and unpaid interest, late charges, and ongoing legal fees, all determined in accordance with the Loan Documents as of the date of such payment in full to NFS, whether or not NFS has previously billed Debtor for any such amounts; and it is further

**ORDERED** that, in the event Debtor fails to sell the Property pursuant to an Agreement of Sale on or before July 1, 2022, the agreement set forth in this consent order shall automatically become null and void, and NFS reserves all of its rights and remedies under the Loan Documents and applicable law, including the right to collect all accrued and unpaid interest, late charges, and ongoing legal fees and costs in accordance with the Loan Documents, whether or not NFS has previously billed Debtor for any such amounts; and it is further

**ORDERED** that NFS' objection to confirmation is hereby resolved; and it is further

**ORDERED** that the Bankruptcy Court shall retain jurisdiction with respect to any matter related to or arising from the implementation or interpretation of this Order.

*[Consent Signature Page Follows]*

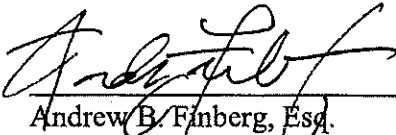
Page No.: 4  
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The undersigned consent and agree  
to the entry of this Stipulation and Consent Order:

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**Law Offices of Andrew B. Finberg, LLC**

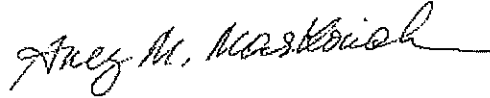


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*Counsel for Debtor*

Dated: April 29, 2022

**MCCARTER & ENGLISH, LLP**



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*Counsel for National Financial Solutions, LLC*

Dated: April 29, 2022